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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

KALVINN JAY GARCIA,

Defendant

NO. CR21-012-JCC

MOTION FOR DETENTION

The United States moves for pretrial detention of the Defendant, pursuant to 18 U.S.C. 3142(e) and (f)

1. **Eligibility of Case.** This case is eligible for a detention order because this case involves (check all that apply):

☒ Crime of violence (18 U.S.C. 3156).

☐ Crime of Terrorism (18 U.S.C. 2332b (g)(5)(B)) with a maximum sentence of ten years or more.

☐ Crime with a maximum sentence of life imprisonment or death.

☐ Drug offense with a maximum sentence of ten years or more.

☐ Felony offense and defendant has two prior convictions in the four categories above, or two State convictions that would otherwise fall within these four categories if federal jurisdiction had existed.

- 1 ☐ Felony offense involving a minor victim other than a crime of violence.
2 ☐ Felony offense, other than a crime of violence, involving possession or use
3 of a firearm, destructive device (as those terms are defined in 18 U.S.C. 921), or any
4 other dangerous weapon.
5 ☐ Felony offense other than a crime of violence that involves a failure to
6 register as a Sex Offender (18 U.S.C. 2250).
7 ☒ Serious risk the defendant will flee.
8 ☐ Serious risk of obstruction of justice, including intimidation of a
9 prospective witness or juror.
10

11 2. **Reason for Detention.** The Court should detain defendant because there
12 are no conditions of release which will reasonably assure (check one or both):

- 13 ☒ Defendant's appearance as required.
14 ☒ Safety of any other person and the community.

15 **Time for Detention Hearing.** The United States requests the Court conduct the
16 detention hearing:

- 17 ☒ At the initial appearance
18 ☐ After a continuance of ____ days (18 U.S.C. 3142(f)(2)).

19 DATED this 12th day of November, 2021.

20 Respectfully submitted,

21 NICHOLAS W. BROWN
22 United States Attorney

23 s/ Rebecca S. Cohen
24 REBECCA S. COHEN
25 Assistant United States Attorney
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